Inspection Report
Solar Turbines International
2200 Pacific Highway
San Diego, California 92138-5376
(RCRA / Non-Major)
CAD008314908

Inspection By: Shelia Lowe
Inspection Date: May 16, 1988
Date of Report: May 18, 1988

I. Purpose:

A Compliance Evaluation Inspection and Land Disposal Restriction Inspection was conducted at Solar Turbines International located at 2200 Pacific Highway in the city of San Diego, California, to evaluate the facility's compliance with state and federal regulations. The last CEI occurred July 2, 1986.

II. Representatives Present:

A. State Inspectors:

Shelia Lowe, Hazardous Materials Specialist California State Department of Health Services, Toxic Substances Control Division, Surveillance and Enforcement Unit.

Robert Senga, Senior Hazardous Materials Specialist California State Department of Health Services, Toxic Substances Control Division, Surveillance and Enforcement Unit.

Brian Wu, Hazardous Materials Specialist California State Department of Health Services, Toxic Substances Control Division, Surveillance and Enforcement Unit.

B. Facility Representatives:

Gerald Hardacre, Principal Environmental and Safety Specialist

Ed. Hillary, Senior Facility Engineer

III. Facility Description and Background:

This facility manufactures components used in the assembly of gas turbine engines. These engines are packaged and used in conjunction with Boost Compressor Pumps which step up pressure in oil

Reference 12

transportation pipe lines. Gas turbine packages are also used in conjunction with generators for emergency electric power in remote areas where electric power is not available. Testing facilities are utilized at this facility to conduct product performance and developmental engineering evaluation.

IV. Waste Streams and Waste Management Procedures:

Hazardous waste generated at this facility are from various types of operations. Machine operations produce waste coolants and oils which are removed at least monthly to be recycled and reused. Waste that is not recyclable is stored in 55 gallon drums and sent off-site for disposal (incineration or landfill). The metal chips produced during machining operations are removed by a scrap metal company. Other waste such as grinding dust is disposed of at a class 1 landfill. Cleaning operations produce acid waste from large process tanks used to clean sheet metal parts prior to assembly and high temperature brazing. This acid waste is neutralized and solidified then disposed of at a class 1 landfill. Kolene waste is produced by a de-scaling operation, used to remove heavy scale from castings. Kolene waste is solid at room temperature and is disposed of at a class 1 landfill.

Paint and solvent sludge is generated from painting operations and equipment clean-up. The paint sludge is stored in 55 gallon drums and disposed of at a class 1 landfill, or by incineration. Plating operations produce acid waste in small quantities and is neutralized prior to disposal. Recycling of 1,1,1-trichloroethane produces 1,1,1-trichloroethane sludge from the distillation process. This sludge is disposed of by incineration.

V. Observations:

A. Record Review:

The following records were reviewed and found to be in order. Manifests from 1985-1988 were reviewed and found in order.

Inspection Records:

" Audit " is done monthly by the Environmental Coordinator (Ed Hillary) and a waste generating-Department Supervisor. Weekly inspections are done by the stores supervisor.

Operation Record:

" Hazardous Waste Log " is kept at the storage area; the information is then put into a computer.

Training Records:

Employee's training records were reviewed and found in order.

Contingency Plan:

Reviewed and found in order.

Other records reviewed and found in order includes: Closure Plan, Updated Closure Cost Estimate, Waste Analysis Plan, Annual and Binneal Reports.

A. Storage: Drums

1. Treatment - Coolant Waste
2. TCE- Distillation

B. Coolant Recycling:

1. To seperate the oil from the coolants, the waste is centrifuged.

2. The oil is collected in a holding tank and later sent off-site to a recycler.

3. The coolant is " Pasteurized " and used.

C. TCE Distillation (1,1,1- Trichloroethane)

Used solvent is received from Kearney Mesa facility, in addition to on-site. The used solvent is recycled the day of arrival. The still runs daily.

Hazardous Waste Storage Area

The safety cabinet contained inspection log, h.w. record log. This area is clean and well managed.

VI. Potential Violations:

The facility is clean and well managed; no violations were noted at the time of the inspection.

VII. Discussion With Management:

The facility has a telephone in their hazardous waste storage area; however, Mr. Hardacre was advised to install some other type of communication system for immediate access purposes.

VIII. Attachments:

Appropriate Checklists

Land Disposal Restrictions
(Part 268)

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listing)			
F001 thru F005 solvents?	X		111-Trichloroethane Cement Mixture
F020-23 and F026-28 Dioxins?			
"California List" H.W.?			
Exceptions:			
Can the prohibited wastes continue to be land disposed because: 268.1(c)-			
(1) A case-by case extension has been granted under Subpart C or 268.5?			N/A
(2) A no-migration petition has been granted under 268.6?			
(3) The waste is contaminated soils or debris resulting from a CERCLA 104 or 106 response action or a RCRA corrective action (until 11/8/88)?			
(4) The waste is from conditionally-exempt small quantity generators?			
(5) A farmer is disposing of waste pesticides in accordance with 262.70? or:			
The waste is not subject to effective CA list prohibitions? 268.32 and:			
The waste has been certified as meeting treatment standards? 268.40(a) or:			
An exemption has been granted because the waste is certified treated by the best developed available technology (BDAT)? 268.44(a)			

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* Land disposal means placement in or on the land, including a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, underground mine or cave, or placement in a concrete vault or bunker for disposal. 268.2(a)

Land Disposal Restrictions--Continued
(Part 268)

	Yes	No	Comments
If F001-5 solvent wastes are being land disposed after 11/8/86 (except in an injection well), are they: 268.30(a)--	N/A		1,1,1-trichloroethane is recycled on site Other solvent mixture
(1) From a 100-1000 kg/mo. generator?			
(2) Generated from a CERCLA response action or corrective action under RCRA?			
(3) The initial generators waste is a solvent-water mixture, solvent-containing sludge or solid, or non-CERCLA or RCRA corrective action solvent-contaminated soil containing less than 1% total F001-5 solvent constituents (Table CCWE of 268.41)?			TCE (Trichloroethane) distillation still on-site. In house recycling.
(4) The solvent waste is a residue from treating a waste listed in (a)(1-3) above? or:			N/A
The solvent waste is a treatment residue not described above where the residue belongs in a different treatability group than the initial waste, and contains less than 1% total F001-5 solvent constituents (Table CCWE of 268.41)?			
Are the F001-5 wastes being land disposed after 11/8/86 exempt from the prohibitions because: 268.30(c)-			
(1) The wastes meet the standards of Subpart D?			
(2) The wastes are disposed of at a facility that has been granted a no-migration exemption?			
(3) The wastes are disposed of at a facility that has been granted a case-by-case exemption?			
Has the facility not merely diluted the restricted waste to achieve compliance? 268.3			

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Land Disposal Restrictions -- Continued
(Part 268)

	Yes	No	Comments
Storage:			
Are restricted wastes only being stored where: 268.50 --			
(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?	X		
(a)(2) A TSD is accumulating a batch as above? and:			
(i) Each container is marked with the contents and accumulation start date?	X		
(ii) Each tank is marked with the contents, accumulation start date, quantity of H.W., and/or the information is in the operating record?			N/A . only stores in containers
(c) The TSD can prove that any storage over one year was solely for the purpose of necessary accumulation? or:			N/A
(d) The wastes are subject to an approved no-migration petition, case-by-case extension, or a nation-wide variance?			
(e) The wastes meet treatment or BDAT standards, or CA list specific prohibitions? or:			
(f) Liquid hazardous wastes over 50 ppm PCBs are stored for less than a year, and in a 761.65(b) (TSCA) complying storage area?			

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	Yes	No	Comments
If restricted wastes are generated on-site, has the generator: 268.7--			
(a) Using knowledge or analysis, determined if the waste is restricted from land disposal?	X		
(1) If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment facility with each shipment of waste, and included:			
(i) EPA H.W. number?	X		
(ii) Appropriate treatment standard and prohibitions?	X		
(iii) Manifest # for the waste?	X		
(iv) Available waste analysis data?	X		
If determined that the waste is restricted based solely on knowledge, is supporting data used in the determination maintained in the operating record? 268.7(a)(4)			N/A
If the waste is determined to be restricted but not require further treatment, has the generator notified the land disposal facility as above, and certified the waste meets both treatment standards and applicable prohibitions, or one of the exemptions? 268.7(a)(2-3)			
For an on-site treatment facility, is the information contained in the notice required by a generator (except for the manifest number) on file? 265.73(b)(11)			Facility weighs its 1,1,1-trichloroethane waste [illegible] the 1,1,1-tri from their satellite companies Kearny Mesa plant
For an on-site land disposal facility, is the information contained in the notice required by a generator or treater (except the manifest number) on file? 265.73(b)(12)			N/A Not a land disposal facility

Recordkeeping:

	Yes	No	Comments
Has the treatment facility tested, noticed, and certified (if appropriate) each waste shipment? 268.7(b)(1-2)	X		

Note: If an off-site shipment without notification has occurred, list the accepting treatment or disposal facility for proper follow-up.

Land Disposal Restrictions--Continued
(Part 268)

	Yes	No	Comments
For an off-site treatment facility, is a copy of the generator's notice on file? 265.73(b)(9)	___	___	Not an off-site treatment facility
If a land disposal facility, have they records of each notice and certification received, and analysis of the waste to confirm compliance? 268.7(c), 265.73(b)(11)	___	___	facility does in house treatment of 111-tri
Surface impoundments:			*NO surface impoundments
If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility: 268.4(a)-			N/A
(1) Treated, not just stored, the wastes in the impoundment?	___	___	
(2) Analyzed and removed all treatment residues (sludge and supernatant*) that do not meet the treatment standards annually?	___	___	
Not placed the residues in another impoundment for subsequent management?	___	___	
Specified the procedures and schedule for sampling, analysis, and removal of any residues in the waste analysis plan?	___	___	
(3) Certified that all impoundments used to treat restricted wastes meet the design requirements (265.221(a)), and the facility is in compliance with GW monitoring (265 Subpart F) requirements?	___	___	
Is evaporation not used as the principal means of treatment? 268.4(b)	___	___	

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* If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed. 268.4(a)(2)

Attachments:

RESTRICTED WASTES AND EFFECTIVE DATES:

Solvents and dioxins:	Effective Date:
Dioxin containing wastes F020-F023, F026-F028	11/8/88
F001-F005 solvent wastes generated solely by small quantity generators of between 100-1000 kg/mo., or in total concentrations of less than 1%	"
F001-5 solvent wastes generated from a response action or corrective action	"
F001-5 solvent waste residues described in 268.30(a)(1-3)	"
All other F001-F005 wastes	11/8/86

"California List" wastes:	Effective date:
Liquid H.W. having a pH $\leq$ 2	7/8/87
Liquid H.W. or solid H.W. with free liquids concentrations $\geq$ for following metals or elements and/or compounds:	"

Arsenic	(as As)	500 mg/l	Mercury	(as Hg)	20 mg/l
Cadmium	(as Cd)	100 mg/l	Nickel	(as Ni)	134 mg/l
Chromium	(as Cr VI)	500 mg/l	Selenium	(as Se)	100 mg/l
Lead	(as Pb)	500 mg/l	Thallium	(as Tl)	130 mg/l

Liquid H.W. containing polychlorinated biphenyls (PCBs) at concentrations $\geq$ 50 ppm	"
Liquid H.W. that are primarily water and contain HOCs in total concentration $\geq$ 1,000 mg/l and less than 10-000 mg/l HOCs	"
Contaminated soil or debris resulting from a response action or corrective action	11/8/88
Liquid H.W. that is not primarily water and contains $\geq$ 1,000 mg/l HOCs	7/8/89
Non-liquid H.W. that contains $\geq$ 1,000 mg/kg HOCs	"
All other "California List" wastes	7/8/87

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F001-F005 spent solvents. Treatment standards effective 11/8/86.	Treatment Standard (mg/l) Wastewaters	All Other Wastes*
Acetone	0.05	0.59
n-Butyl alcohol	5.00	5.00
Carbon disulfide	1.05	4.81
Carbon tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols	2.82	0.75
Cresylic acid	2.82	0.75
Cyclohexanone	0.125	0.75
1,2-Dichlorobenzene	0.65	0.125
Ethyl acetate	0.05	0.75
Ethyl benzene	0.05	0.053
Ethyl ether	0.05	0.75
Isobutanol	5.00	5.00
Methanol	0.25	0.75
Methylene chloride	0.20	0.96
Methylene chloride from pharmaceutical industry	12.70	0.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichloroethane	1.05	0.96
1,1,2-Trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

* The treatment standards in this treatability group are based on incineration.

F020, F021, F022, F023, F026, F027 or F028 dioxin containing wastes. These treatment standards become effective 11/8/88.	Treatment Standard
HxCDD-All Hexachlorodibenzo-p-dioxins	< 1 ppb
HxCDF-All Hexachlorodibenzofurans	< 1 ppb
PeCDD-All Pentachlorodibenzo-p-dioxins	< 1 ppb
PeCDF-All Pentachlorodibenzofurans	< 1 ppb
TCDD-All Tetrachlorodibenzo-p-dioxins	< 1 ppb
TCDF-All Tetrachlorodibenzofurans	< 1 ppb
2,4,5-Trichlorophenol	< 0.05 ppm
2,4,6-Trichlorophenol	< 0.05 ppm
2,3,4,6-Tetrachlorophenol	< 0.10 ppm
Pentachlorophenol	< 0.01 ppm

Note: Where a single constituent is addressed under more than one rulemaking, the applicable treatment standard or prohibition level is that for the more specific waste stream.
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Halogenated Organic Compounds Regulated Under § 268.32

In determining the concentration of HOCs in a hazardous waste for purposes of the § 268.32 land disposal prohibition EPA has defined the HOCs that must be included in the calculation as any compounds having a carbon-halogen bond which are listed in this Appendix (see § 268.2). Appendix III to Part 268 consists of the following compounds:

Volatiles

Bromodichloromethane
Bromomethane
Carbon Tetrachloride
Chlorobenzene
2-Chloro-1,3-butadiene
Chlorodibromomethane
Chloroethane
2-Chloroethyl vinyl ether
Chloroform
Chloromethane
3-Chloropropene
1,2-Dibromo-3-chloropropane
1,2-Dibromomethane
Dibromomethane
Trans-1,4-Dichloro-2-butene
Dichlorodifluoromethane
1,1-Dichloroethane
1,2-Dichloroethane
1,1-Dichloroethylene
Trans-1,2-Dichloroethene
1,2-Dichloropropane
Trans-1,3-Dichloropropene
cis-1,3-Dichloropropene
Iodomethane
Methylene chloride
1,1,1,2-Tetrachloroethane
1,1,2,2-Tetrachloroethane
Tetrachloroethene
Tribromomethane
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Trichloroethene
Trichloromonofluoromethane
1,2,3-Trichloropropane
Vinyl chloride

Semivolatiles

Bis(2-chloroethoxy)ethane
Bis(2-chloroethyl)ether
Bis(2-chloroisopropyl) ether
p-Chloroaniline
Chlorobenzilate
p-Chloro-m-cresol
2-Chloronaphthalene
2-Chlorophenol
3-Chloropropionitrile
m-Dichlorobenzene
o-Dichlorobenzene
p-Dichlorobenzene
3,3'-Dichlorobenzidine
2,4-Dichlorophenol
2,6-Dichlorophenol
Hexachlorobenzene
Hexachlorobutadiene
Hexachlorocyclopentadiene
Hexachloroethane
Hexachloroprophene
Hexachloropropene
4,4'-Methylenebis(2-chloroaniline)
Pentachlorobenzene
Pentachloroethane
Pentachloronitrobenzene
Pentachlorophenol
Pronamide
1,2,4,5-Tetrachlorobenzene
2,3,4,6-Tetrachlorophenol
1,2,4-Trichlorobenzene
2,4,5-Trichlorophenol
2,4,6-Trichlorophenol
Tris(2,3-dibromopropyl)phosphate

Organochlorine Pesticides

Aldrin
alpha-BHC
beta-BHC
delta-BHC
gamma-BHC
Chlordane
DDD
DDE
DDT
Dieldrin
Endosulfan I
Endosulfan II
Endrin
Endrin aldehyde
Heptachlor
Heptachlor epoxide
Isodrin
Kepone
Methoxyclor
Toxaphene

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Phenoxyacetic Acid Herbicides

2,4-Dichlorophenoxyacetic acid
Silvex
2,4,5-T

PCBs

Aroclor 1016
Aroclor 1221
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260
PCBs not otherwise specified

Dioxins and Furans

Hexachlorodibenzo-p-dioxins
Hexachlorodibenzofuran
Pentachlorodibenzo-p-dioxins
Pentachlorodibenzofuran
Tetrachlorodibenzo-p-dioxins
Tetrachlorodibenzofuran
2,3,7,8-Tetrachlorodibenzo-p-dioxin

n 10. U.S. EPA ID Number

Enter the U.S. EPA twelve-digit identification ber of the designated facility identified in item

n 11. U.S. DOT Description

Enter the U.S. DOT Proper Shipping Name, ard Class, and ID Number (UN/NA) for each e as identified in 49 CFR 171 through 177.

n 12. Containers (No. and Type)

Enter the number of containers for each te and the appropriate abbreviation from e l (below) for the type of container.

Receipt of Materials

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Item 18. Transporter 2 Acknowledgement of Receipt of Materials

Enter, if applicable, the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Generator — Enter waste category numbe
Select appropriate number from Table
Review entire table before selecting a numb
Do not fill in handling code(s).

J. Additional Descriptions For Materials Lis
Above

Generator — Enter chemical compositi
for each waste category. List componer
corresponding to the waste category entered.

K. Handling Codes for Wastes Listed Above
Operator of TSDF — Enter waste handli
code(s). Select appropriate code(s) from Ta
IV.

ricted Wastes

- Liquids with cyanides ≥ 1000 Mg./L
- Liquids with arsenic ≥ 500 Mg./L
- Liquids with cadmium ≥ 100 Mg./L
- Liquids with chromium (VI) ≥ 500 Mg./L
- Liquids with lead ≥ 500 Mg./L

Table III

725. Liquids with mercury ≥ 20 Mg./L
726. Liquids with nickel ≥ 134 Mg./L
727. Liquids with selenium ≥ 100 Mg./L
728. Liquids with thallium ≥ 130 Mg./L
731. Liquids with polychlorinated biphenyls ≥ 50 Mg./L
741. Liquids with halogenated organic compounds ≥ 1000 Mg./L
751. Solids or sludges with halogenated organic compounds ≥ 1000 Mg./Kg.
791. Liquids with pH < 2
801. Waste potentially containing Dioxins

restricted Wastes

rganics

1. Acid solution 2 < pH < 7 with metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, selenium, silver, thallium, vanadium, and zinc)
2. Acid solution without metals
3. Unspecified acid solution
1. Alkaline solution (pH ≥ 12.5) with metals (see 111.)
2. Alkaline solution without metals
3. Unspecified alkaline solution
1. Aqueous solution (2 < pH < 12.5) containing reactive anions (azide, bromate, chlorate, cyanide, fluoride, hypochlorite, nitrite, perchlorate, and sulfide anions)
2. Aqueous solution with metals (see 111.)
3. Aqueous solution with total organic residues 10 percent or more
4. Aqueous solution with total organic residues less than 10 percent
5. Unspecified aqueous solution
1. Off-specification, aged, or surplus inorganics
1. Asbestos-containing waste
1. FCC waste
2. Other spent catalyst
1. Metal sludge (see 111.)
2. Metal dust (see 111.) and machining waste
1. Other inorganic solid waste

Organics

11. Halogenated solvents (chloroform, methyl chloride, perchloroethylene, etc.)
12. Oxygenated solvents (acetone, butanol, ethyl acetate, etc.)
13 Hydrocarbon solvents (benzene, hexane, Stoddard, etc.)
14. Unspecified solvent mixture
21. Waste oil and mixed oil
22. Oil/water separation sludge
23. Unspecified oil-containing waste
31. Pesticide rinse water
32. Pesticides and other waste associated with pesticide production
41. Tank bottom waste
51. Still bottoms with halogenated organics
52. Other still bottom waste
61. Polychlorinated biphenyls and material containing PCBs
71. Organic monomer waste (includes unreacted resins)
72. Polymeric resin waste
81. Adhesives
91. Latex waste
11. Pharmaceutical waste
21. Sewage sludge
22. Biological waste other than sewage sludge
31. Off-specification, aged, or surplus organics
41. Organic liquids (nonsolvents) with halogens
42. Organic liquids with metals (see 111.)
43. Unspecified organic liquid mixture
51. Organic solids with halogens
52. Other organic solids

Sludges

11. Alum and gypsum sludge
21. Lime sludge
31. Phosphate sludge
41. Sulfur sludge
51. Degreasing sludge
61. Paint sludge
71. Paper sludge/pulp
81. Tetraethyl lead sludge
91. Unspecified sludge waste

Miscellaneous

11. Empty pesticide containers 30 gal.
12. Other empty containers 30 gallons
13. Empty containers less than 30 gallons
21. Drilling Mud
31. Chemical toilet waste
41. Photochemicals/photoprocessing waste
51. Laboratory waste chemicals
61. Detergent and soap
71. Fly ash, bottom ash, and retort ash
81. Gas scrubber waste
91. Baghouse waste
11. Contaminated soil
12. Household wastes

Table IV

01 Recycle (R01)
02 Injection Well (D79)
03 Landfill (D80)
04 Land Application (D81)
05 Ocean Disposal (D82)
06 Surface Impoundment (D83)
07 Thermal Treatment (T03) (Include Incineration)
08 Neutralization (T31)
09 Filtration (T47)
10 Stabilization Pond (T76)
14 Transfer Station (H01)
15 Tank Treatment (T01)
16 Treatment Pond (T02)
99 Other (D99)

Generators--General: (Part 262 Subpart A)

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	Yes	No	Comments
Has the generator of solid wastes made a hazardous waste (H.W.) determination by determining if the waste is: 262.11-			
(a) Excluded from regulation under 261.4?	___	___	
(b) Listed as a H.W. in 261 Subpart D?	X	___	
(c) Exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	X	___	
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	___	___	N/A
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	X	___	
Is the waste an exempt recyclable material: 261.6(a)(3)-			
(i) Industrial ethyl alcohol that is reclaimed (unless provided otherwise in an international agreement)?	___	___	N/A
(ii) Used batteries or cells returned to the manufacturer for regeneration?	___	___	
(iii) Used oil not burned for energy recovery?	___	___	
(iv) Scrap metal?	___	___	
(v-ix) Specific steel (K087) and petroleum refinery production wastes?	___	___	
If the waste is any of the following recyclable materials, complete Parts 270 (permits and notifications), and 266 Subparts A-G of the TSD checklists: 261.6(a)(2)-			
(i) Those used in a manner constituting disposal (Subpart C)?	___	___	
(ii) H.W.s burned for energy recovery in boilers and industrial furnaces not regulated as an incinerator (Subpart D)?	___	___	
(iii) H.W. characteristic used oil that is burned as above (Subpart E)?	___	___	
(iv) Those from which precious metals are reclaimed (Subpart F)?	___	___	
(v) Spent lead-acid batteries that are reclaimed (Subpart G)?	___	___	

Conditionally Exempt Small Quantity Generators (Part 261)

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	Yes	No	Comments
Does the facility qualify as a conditionally exempt small quantity generator each calendar month by:			
Generating less than 100 kgs and acumulating less than 1000 kgs of H.W. on site? 261.5(a),(g) or:			N/A
Generating less than 1 kg of acute H.W., or 100 kgs of acute H.W. contaminated soil or spill residues? 261.5(e)(1-2)			
Did the quantity determination include all listed and characteristic wastes generated except: 261.5(d)-			
(1) H.W. removed from on-site storage?			
(2) H.W. produced by on-site treatment or reclamation of H.W. that was already counted once?			
(3) Spent materials that have already been counted once and that are reclaimed, reused, and subsequently generated on site? or:			
H.W. exempted from regulation? 261.5(c)			
Has the conditionally exempt small quantity generator treated or disposed of the H.W. in an on-site facility, or ensured delivery to an off-site U.S. TSD, either of which is: 261.5(f,g)(3)-			
(i) Permitted under Part 270?			
(ii) In interim status under 265 and 270?			
(iii) Authorized by an approved state under Part 271?			
(iv) Permitted, licensed, or registered by a state to manage municipal or industrial solid waste? or:			
(v) A facility which:			
(A) Legitimately uses, reuses, recycles, or reclaims the waste? or:			
(B) Treats its waste prior to use, reuse, recycling, or reclaiming?			

For any month that the generator did not meet these requirements, go to next page.

Generators of Between 100 and 1,000 kg/month (Part 262)

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	Yes	No	Comments
(3) (Cont.) Complied with requirements for Subpart C, preparedness and prevention?	X		
Clearly marked the date accumulation started on each container?	X		
Labelled each container and tank with the words "Hazardous Waste"?	X		
Does the generator have at least one emergency coordinator (E.C.) on site or immediately available at all times? 262.34(d)(4)(i)	X		
Is the following information posted next to the telephone: 262.34(d)(4)(ii)-			
(A) E.C.'s name and phone number?	X		
(B) Location of fire extinguishers, spill control material, and any fire alarms?	X		
(C) If no direct alarms, the phone number of the fire department?	X		
Are all employees are familiar with their jobs' proper waste handling and emergency procedures? 262.34(d)(iii)	X		
If an emergency has occurred, has the emergency coordinator: 262.34(d)(iv)-			NO emergency has occurred at the facility
(A) Tried to extinguish the fire, or called the fire department?			N/A
(B) In the event of a spill, contained the flow of H.W., and cleaned up as soon as possible?			
(C) Determined if the emergency is threatening human health or surface water outside the facility, and if so called the National Response Center at (800)424-8802 and reported:			
(1) The generator's name, address, and ID #?			
(2) Date, time, and type of incident?			
(3) Quantity and type of H.W. involved?			
(4) Extent of any injuries?			
(5) Estimated quantity and disposition of any recovered materials?			
If the generator exceeded the applicable storage time or quantity limit without an EPA extension, did they comply with all TSD storage facility regulations? 262.34(e-f)	X		TSD facility

Generators:
(Part 262)

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INSPECTOR Lowe

	Yes	No	Comments
Manifests: 262.20			
(a) Does the generator prepare a complete manifest according to the instructions (see Appendix) before transporting H.W. off-site?	X		
(b) Does the generator designate on the manifest one facility which is permitted to handle H.W.?	X		
(c) Has the facility designated an emergency alternate facility? or:	X		
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	X		
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is? or, if not provided by that State:	X		
(b) Where the generating facility is?	X		
(c) If not provided by either State, the EPA form from another source?			N/A
Did the manifest consist of enough copies? 262.22	X		
Did the generator: 262.23(a)			
(1) Sign the manifest by hand?	X		
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	X		
(3) Keep one copy of the manifest (per 262.40(a))?	X		
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	X		
If the shipment was sent by water or rail, was 262.23 complied with?			N/A

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INSPECTOR Lowe

Pre-Transport Requirements: (262 Subpart C)

	Yes	No	Comments
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	X		
Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31	X		
Are containers marked in accordance with DOT regulations (49 CFR 172.101)? 262.32(a) including:	X		
Proper shipping name [table column 2]?	X		
Proper ID number [table column 3A]?	X		
Proper ORM designation for containers of ORM-A,B,C,D or E wastes?	X		
Are containers of 110 gallons or less marked with the following words? 262.32(b)			
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency. Generators Name & Address X Manifest Document Number X	X		
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33	X		
Accumulation Time:			
The generator may accumulate at or near the point of initial generation up to 55 gals of H.W., or one quart of acutely hazardous waste, provided: 262.34(c)(1)-			
(i) H.W. from containers not in good condition or leaking were transferred into good containers?	Y		
Containers are compatible with the H.W. stored in them?	X		
Containers are stored closed?	X		
(ii) The containers are marked either with the words "Hazardous Waste" or labels that identify the contents?	/		

IV. Pre-Transport Requirements: (Part 262 Subpart C)

DATE 5/16/88

FOG # 4908

INSPECTOR Lowe

	Yes	No	Comments
If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a)			N/A Permitted facility
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	X		
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)	X		
Does the generator comply with the requirements of 40 CFR Part 265: 262.34(a)(1), -(4)			
Subpart I for the use and management of containers?	X		
Subpart J for tanks (except 265.197(c), closure of tanks without secondary containment, and 265.200)?			N/A Facility only stores in containers
265.111 for tank closure performance standards?			
265.114 for tank decontamination after closure?			
Subpart C for preparedness and prevention?	X		
Subpart D for contingency plan and emergency procedures?	X		
265.16 for personnel training?	X		
If the generator has stored H.W. on-site for more than 90 days, have they: 262.34(b)			Permitted facility
Been granted an extension from the EPA? or:			N/A
Complied with the 40 CFR Parts 264 and 265 and the permitting requirements in Part 270 of RCRA?			

Recordkeeping and Reporting: (Part 262 Subpart D)

DATE 5/16/88

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INSPECTOR Louie

	Yes	No	Comments
Are the following kept for at least three years: 262.40—			
(a) Manifest signed by the receiving facility?	X		
(b) Biennial Reports and Exception Reports?	X		
(c) Test results, waste analysis or other determinations made in accordance with 262.11?	X		
Biennial Report:			
If the facility has shipped any waste off-site to a U.S. TSD, have they submitted a Biennial Report to the RA by March 1 of each even numbered year? 262.41(a)	X		
Was the report submitted on EPA Form 8700-13A and cover generator activities during the previous calendar year? 262.41(a)	X		
Does the report include the following information: 262.41(a)—			
(1) EPA ID No., name and address of the generator?	X		
(2) Calendar year covered by the report?	X		
(3) The EPA ID No., name, and address for each off-site U.S. TSD to which H.W. was shipped during the year?	X		
(4) Name and EPA ID No. of each transporter used during the year to ship to a U.S. TSD?	X		
(5) Description, EPA hazardous waste No., DOT hazard class and quantity of each H.W. shipped off-site to a U.S. TSD?	X		
Was this information listed by EPA ID No. of each off-site U.S. TSD to which H.W. was shipped?	Y		

Recordkeeping and Reporting:--Continued (Part 262 Subpart D)

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INSPECTOR Louie

	Yes	No	Comments
(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?	X		
(7) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (back to 1984 if available)?	X		
(8) The signed certification?	X		
Exception Reporting: 262.42			
(a) For a generator that has not received a signed copy of the manifest from the designated facility within 35 days, has the generator determined the status of the H.W.?			N/A Facility has not had to file an Exception Report
(b) For a generator that has not received a signed copy of the manifest within 45 days, has the generator submitted an Exception Report to the RA?			
Did the Exception Report include: 262.42(b)-			
(1) A legible copy of the manifest?			
(2) A signed cover letter explaining the efforts taken to locate the H.W. and the results of those efforts?			

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INSPECTOR Lowe

Exports of Hazardous Waste: (Part 262 Subpart E)

Facility does not export H.W.

	Yes	No	Comments
Exports of H.W. are prohibited unless: 262.52			
(a) Notification (262.53) has been provided?			
(b) The receiving country has consented to accept the waste?			
(c) A copy of the EPA Acknowledgment of Consent accompanies the shipment, and is attached to the the manifest or shipping paper?			
(d) The H.W. shipment conforms to the receiving country's written terms in the EPA Acknowledgment of Consent?			
Did the primary exporter of H.W. notify the EPA each calendar year of intended exports? 262.53(a)			
Was the notification at least 60 days before the intended date of the initial off-site shipment for the calendar year? 262.53(a)			
Did the notice signed by the primary exporter include his name and address and the following information, by consignee, for each H.W. type: 262.53(a)(1), (2)-			
(i) A description of the H.W., the EPA waste identification no. and the DOT shipping description (40 CFR 171-177)?			
(ii) The estimated frequency and time span of exportation?			
(iii) The estimated total quantity?			
(iv) All points of entry to and departure from each foreign country the H.W. will pass through?			
(v) How the waste will be transported (types of vehicles and containers)?			
(vi) A description of how the waste will be treated, stored, or disposed of in the receiving country?			
(vii) The name and site address of the foreign consignee(s)?			
(viii) The name of each country the H.W. will pass through, for how long it will remain there, and how it will be handled during that time?			

Exports of Hazardous Waste: Continued
(Part 262 Subpart E)

	Yes	No	Comments
Was the export notification marked "Attention: Notification to Export" and sent to: Office of International Activities (A-106) EPA, 401 M St. SW., Washington DC 20460? 262.53(b)	___	___	* Facility does not export H.W.
Has the primary exporter not shipped waste until the notification was correct and an EPA Acknowledgment of Consent was received? 262.53(c)	___	___	
Does the exporter meet the requirements for use of the manifest, except that: 262.54-			DATE 5/16/88
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			INSPECTOR Lowe
(a-b) The name and address of the foreign consignees are substituted for the name, address and EPA ID No. of the designated facilities?	___	___	
(c) The generator identifies the point of departure from the U.S. under Special Handling Instructions and Additional Information?	___	___	
(d) The phrase "and conforms to the terms of the attached EPA Acknowledgment of Consent" is added to the end of the first sentence in the certification?	___	___	
(e) The primary exporter's appropriate State manifest is used where required?	___	___	
(f) The primary exporter requires that the consignee confirm delivery of H.W. in the foreign country (e.g., manifest signed by foreign consignee and returned to generator)?	___	___	
If the shipment could not be delivered to the consignees, did the primary exporter: 262.54(g)-			
(1) Renotify the EPA, request approval of shipment to a new consignee, and obtain a new EPA Acknowledgement of Consent prior to delivery? or:	___	___	
(2) Instruct the transporter to return the shipment to the U.S.? and:	___	___	
(3) Instruct the transporter to revise the manifest accordingly?	___	___	

Exports of Hazardous Waste: Continued
(Part 262 Subpart E)

	Yes	No	Comments
(h) A copy of the EPA Acknowledgment of Consent accompanies the shipment, and is attached to the manifest or shipping paper?			* Facility does not export H.W.
(i) The primary exporter provides an extra manifest copy for the transporter to give to U.S. Customs?			
Did the primary exporter file an Exception Report if: 262.55			DATE 5/16/88 CA D 008 314 908 INSPECTOR Lowe
(a) A signed copy of the manifest from the transporter stating date and place of departure from U.S. had not been received in 45 days?			
(b) A written confirmation from the foreign consignee had not been received within 90 days?			
(c) The waste was returned to the U.S.?			
Has the facility submitted an Annual Report to the RA by March 1 of each year, summarizing the types, frequency, quantity, and ultimate destination of all H.W. exported during the previous calendar year? 262.56(a)			
Did the report include the following information: 262.56(a)-			
(1) EPA ID No., name, mailing and site and address of the exporter?			
(2) Calendar year covered by the report?			
(3) The name and site address of each consignee?			
(4) Description, EPA hazardous waste No., DOT hazard class and quantity of each H.W. shipped to each consignee, the name and ID No. of each transporter, the total amount of waste shipped and the number of shipments pursuant to each notification?			

Exports of Hazardous Waste: Continued
(Part 262 Subpart E)

	Yes	No	Comments
(5) Except for 100-1000 kg/mo. generators, each even numbered year:			Facility does not export H.W.
(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated? and:			
(ii) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (prior to 1984 if available)?			
(6) A signed certification which states:			

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Was the annual report sent to: Office of International Activities (A-106), EPA, 401 M Street SW., Washington DC 20460?			
Did the primary exporter keep for at least three years a copy of each: 262.57(a)-			
(1) Notification of intent to export (from the date the H.W. was accepted)?			
(2) EPA Acknowledgment of Consent (from the date the H.W. was accepted by the initial transporter)?			
(3) Confirmation of delivery (from the date the H.W. was accepted by the initial transporter)?			
(4) Annual report (from the due date)?			

DATE 5/16/85

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INSPECTOR Grace

Imports of Hazardous Waste (Part 262 Subpart F)

	Yes	No	Comments
Does the facility import H.W. from a foreign country into the U.S.? 262.60(a)			
When importing H.W., do they comply with all manifest requirements except that: 262.60(b)--			
(1) The name, address, and EPA ID No. of the importer is used instead of the generator?			
(2) The U.S. importer or his agent signs and dates the certification and obtains the signature of the initial transporter?			
Did the importer use the manifest supplied and required by the consignment State? 262.60(c)			

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INSPECTOR Lowe

Farmers
(Part 262 Subpart G)

	Yes	No	Comments
A farmer disposing of waste pesticides is not required to comply with Part 262 generator standards or Parts 270, 264, or 265 provided he: 262.70			N/A
The pesticides are from his own use?	___	___	
Triple-rinses each pesticide container in accordance with 261.7(b)(3)?	___	___	
Disposes of the residues on his own farm in a manner consistent with the disposal instructions on the pesticide label?	___	___	

DATE.....

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INSPECTOR.....

DATE 5/16/85

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INSPECTOR L Olive

Imports of Hazardous Waste
(Part 262 Subpart F)

	Yes	No	Comments
Does the facility import H.W. from a foreign country into the U.S.? 262.60(a)			
When importing H.W., do they comply with all manifest requirements except that: 262.60(b)—			
(1) The name, address, and EPA ID No. of the importer is used instead of the generator?			
(2) The U.S. importer or his agent signs and dates the certification and obtains the signature of the initial transporter?			
Did the importer use the manifest supplied and required by the consignment State? 262.60(c)			

DATE.....

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INSPECTOR Love

Generators of Between 100 and 1,000 kg/month That Accumulate H.W. in Tanks (Part 265 Subpart J)

	Yes	No	Comments
Are ignitable or reactive waste not placed in a tank, unless: 265.201(e)(1)-			
(i) The waste is treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity? or:			Only Stores HW in Containers
(ii) The waste is stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? or:			
(iii) The tank is used solely for emergencies?			
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.201(e)(2)			
Unless 265.17(b) is complied with: 265.201(f)-			
(1) Are incompatible wastes stored in separate tanks?			
(2) Is H.W. not placed in unwashed tanks that previously held an incompatible waste or material?			

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INSPECTOR Lowe